

EXHIBIT 116

Lisa Waters

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2 UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 - - - - -
5 JANE DOE 1, Individually and on behalf
6 of all others similarly situated,
7 Plaintiff,
8 vs. Case No.
9 22-CV-10019-JSR
10 JPMORGAN CHASE BANK, N.A.,
11 Defendant/Third-Party
12 Plaintiff.
13 -----
14 JPMORGAN CHASE BANK, N.A.,
15 Third-Party Plaintiff,
16 vs.
17 JAMES EDWARD STALEY,
18 Third-Party Defendant.
19 -----
20 GOVERNMENT OF THE U.S. VIRGIN ISLANDS,
21 Plaintiff,
22 vs. Case No.
23 22-cv-10904-JSR
24 JPMORGAN CHASE BANK, N.A.,
Defendant/Third-Party
Plaintiff.

JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff,
vs.
JAMES EDWARD STALEY,
Third-Party Defendant.

VIDEOTAPED DEPOSITION of LISA WATERS
WilmerHale
60 State Street, Boston, Massachusetts
Thursday, August 24, 2023 - 9:40 a.m.

GOLKOW LITIGATION SERVICES
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1 to remove Ms. Casey from covering Mr. Epstein?

2 A. I mean, he committed to work toward it.

3 He said he understood why she did not want to and

4 that no one should cover anyone they're

5 uncomfortable with.

6 Q. And I think you said something along the

7 lines of "we will work on that." What did you

8 understand him to mean?

9 A. Well, my understanding what that meant is

10 he would, he and the market manager or whoever

11 was managing the team, would work to find another

12 coverage person for the banking relationship

13 there.

14 Q. Do you remember anything else that

15 Ms. Casey said in that meeting?

16 A. No. I think that's what -- that was her

17 topic that she wanted to cover with him and she

18 covered that.

19 Q. Did she express an opinion in that

20 meeting about whether Mr. Epstein should or at

21 large remain a client of the Private Bank?

22 A. I don't believe so.

23 Q. What did you say in the meeting?

24 A. So again, it wasn't planned that I was

1 going to say something at the meeting; but I did
2 say to him, "You know, it's very uncomfortable
3 for anyone covering him; and no one really wants
4 to cover him. The charges are very uncomfortable
5 and involved a minor." I said, "My personal
6 opinion is I have children; I wouldn't let him be
7 around my family." I said, "How do you feel
8 about that? You have two daughters." And he
9 said, "I do understand how people could feel that
10 way, and it's difficult; but I did speak with him
11 -- Mr. Epstein -- and he said it was a
12 misunderstanding and he made a mistake. And I do
13 feel comfortable. I have socialized with him and
14 my family."

15 And he was respectful; but said, you
16 know, politely that he disagreed and that's why
17 the decision was made.

18 And I said, "Okay. It's the company you
19 keep; I don't feel it looks good for the firm and
20 it makes people uncomfortable." And he said: "I
21 appreciate you expressing your opinion."

22 He was very cordial and the discussion
23 ended.

24 Q. Do you remember anything else he said?